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## KRIEGER KIM & LEWIN LLP

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September 28, 2022

By ECF

The Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 APPLICATION GRANTED SO ORDERED A VERNON S. BRODERICK U.S.D.J. 09/30/2022

Re: United States v. Dhirenkumar Patel, 22 Cr. 369 (VSB)

Dear Judge Broderick:

As Your Honor knows, we represent Dhirenkumar Patel in the above-captioned case. We write to respectfully request that the Court modify the bail conditions imposed by the Court on July 7, 2022. *See* ECF No. 5. The government and Pretrial Services do not object to this request.

Under the terms of his release, Mr. Patel must remain within the Southern District of New York, Eastern District of New York, District of New Jersey, Northern District of California, and Eastern District of California, with air travel permitted between these districts.

Mr. Patel, who resides in the Northern District of California, expects that his employment obligations will soon require him to travel to various areas of the contiguous United States. Accordingly, we respectfully request that, in addition to his current unrestricted travel to the districts listed above, Mr. Patel be permitted to travel to any of the 48 contiguous states for employment purposes, with the condition that Mr. Patel first provide his travel itinerary to Pretrial Services.

We thank the Court for its consideration of this request.

Respectfully submitted,

KRIEGER KIM & LEWIN LLP

By:

Edward Y. Kim Varun A. Gumaste

cc: AUSA Noah Solowiejczyk AUSA Richard Cooper